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A Center for Preparedness Excellence

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Federal Communications Commission
Office of the Secretary

November 10, 2014

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

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Dear Chairman Wheeler:

As you are aware, the FCC's Local Number Portability Administrator (LNPA) provides three very important services that enhance public safety: the Local Number Portability Enhanced Analytical Platform (LEAP), data validation for 9-1-1 call centers, and porting of telephone numbers from damaged switches to operational ones post-disaster. After July 15, the LNPA will no longer be required to maintain these critical features, which is deeply concerning to our organization. Below, we have outlined the positive impacts that these LNPA services have on the general public, as well as reasons for including them as vendor requirements.

Local Number Portability Enhanced Analytical Platform (LEAP)

Over the years, LEAP has enabled police and federal agencies to track suspects' phone numbers, even when they switch cell carriers. Currently, the LNPA plays an essential role in maintaining the LEAP program so that law enforcement agencies on the local, state, and federal levels can prevent crime and acts of terror. This program is queried more than four million times per year and is a successful tool in bringing criminals to justice. If the FCC no longer requires the LNPA to provide LEAP, then the ability for law enforcement to pursue suspects will become much more difficult, putting public safety at great risk.

9-1-1 Data Management

The LNPA has to date provided essential data validation for 9-1-1 call centers, allowing first responders to more reliably locate people during emergency situations. By synchronizing ported telephone number data with Public Safety Answering Points (PSAPs) databases, 9-1-1 operations are able to maintain accurate and up-to-date information for first responders and the emergency management community. Without this vital synchronization process, first responders may not have the necessary information to assist those in trouble, particularly those who may not be able to provide their location, such as small children or victims who lose consciousness.

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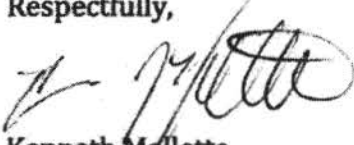"A Prepared Marylander Creates a Resilient Maryland"

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Restoring Telephone Service Post-Disaster

Thousands of people rely on cell service to coordinate evacuations and contact loved ones after disasters. Presently, the LNPA is able to support provision of phone to those impacted by disaster, which immensely helps in fostering emergency response. When major disasters occur, local switches where calls are routed can be damaged, knocking out cell service. This situation can be remedied if the LNPA reroutes the calls of impacted telephone numbers from damaged switches to functioning switches in other parts of the country. In the past, there has been much success with this system. For instance, after Hurricane Katrina, the LNPA ported more than 300,000 numbers, and after 9/11 they ported approximately 60,000. These successes prompted states including New York and Florida to integrate this capability into their own emergency management systems.

We hope that you and the Commission realize the significance of these services that the LNPA currently provides and how they contribute to emergency preparedness. Therefore, we ask that you consider reopening the request for proposal (RFP) period for LNPA, and ensure that these services are requirements, not options.

Respectfully,

Kenneth Mallette,
Executive Director

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